

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	Case Number 1:23cr00583
)	
Plaintiff,)	Judge J. Philip Calabrese
)	
v.)	
)	
PATRICIA BONCHEK,)	<u>MOTION TO CONTINUE</u>
)	<u>SENTENCING HEARING</u>
Defendant,)	

Now comes the Defendant, Patricia Bonchek, by and through her Attorney Kevin Cafferkey, who respectfully asks this Honorable Court to grant her Motion to Continue the May 14, 2025 Sentencing Hearing. Defense Counsel would like a little more time to prepare for the Sentencing Hearing.

Defense Counsel has had an unusually busy trial calendar. Currently, he has 2 jury trials set for May 12, 2025 that include a shooting where the Defendant has been charged with Felonious Assault with Firearm Specifications and an Aggravated Robbery trial with Firearm Specifications. In addition, Defense Counsel has had an Aggravated Murder trial set on May 5, 2025 and a Strangulation trial involving a detention center corrections officer on April 28, 2025. Finally, Defense Counsel had a heavily involved Federal sentencing on May 4, 2025 in Toledo before Judge James Carr that required a lengthy Sentencing Memorandum. That Defendant was housed in Stryker Jail which required a 5 hour roundtrip drive in order to prepare him for sentencing.

In the present case, Defense Counsel has gone over the Presentence Report with Ms. Bonchek. However, he needs a little more time to prepare her for her Sentencing

Hearing. The Government has no objection to a continuance and both Parties understand the Sentencing Hearing could not take place until the week of June 9, 2025 or later.

For all of the above reasons, the Defendant respectfully asks this Honorable Court to grant her Motion to Continue the May 14, 2025 Sentencing Hearing.

Respectfully submitted

/s/Kevin M. Cafferkey

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CERTIFICATE OF SERVICE

I hereby certify that on May 8, 2025, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/Kevin M. Cafferkey
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Attorney for Defendant, Patricia Bonchek